

UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF VIRGINIA  
Richmond Division

In re: Keith Hamner Waldrop  
d/b/a Keith H. Waldrop & Associates  
Debtor In Possession,

Case No. 13-33837-KRH

Chapter 11

Address: P.O. Box 268  
Goochland, VA 23063

SSN: XXX-XX-1942

NOTICE OF MOTION

The Debtor(s) by counsel has/have filed papers with the court a **MOTION TO SELL PROPERTY OF THE ESTATE**

**Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. If you do not have an attorney, you may wish to consult one.**

If you do not want the court to grant the relief sought in the motion, or if you want the court to consider your views on the motion, then on or before May 14, 2014, you or your attorney must:

  X   File with the court, at the address shown below, a written request for a hearing [or a written response pursuant to Local Rule 9013-1(H)]. If you mail your request for hearing (or response) to the court for filing, you must mail it early enough so the court will receive it on or before the date stated above.

Clerk of Court  
United States Bankruptcy Court  
701 E. Broad Street, Room 4000  
Richmond, VA 23219

You must also mail a copy to:

Wm. C. Parkinson, Jr., Esquire  
Wm. C. Parkinson, Jr., P.C.  
5310 Markel Road, Suite 200  
Richmond, VA 23230

\_\_\_\_\_ Attend a hearing to be scheduled at a later date. You will receive separate notice Of hearing. If no timely response has been filed opposing the relief requested, the court may grant the relief without a hearing.

\_\_\_\_X\_\_\_\_ Attend the hearing on the motion scheduled to be held on May 21, 2014, at 10:30 a.m. at United States Bankruptcy Court, 701 E. Broad Street, Room 5000, Richmond, VA 23219.

If you or your attorney do not take these steps, the court may decide that you do not oppose the relief sought in the motion and may enter an order granting that relief.

Date: 4/25/14

Notice given by:

/s/ Wm. C. Parkinson, Jr.

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Wm. C. Parkinson, Jr. Esquire  
Wm. C. Parkinson, Jr., P.C.  
5310 Markel Road, Suite 200  
Richmond, VA 23230  
(804) 288-9026  
VSB 14765  
Counsel for Keith Hamner Waldrop

CERTIFICATE OR SERVICE

I hereby certify that I have this 25th day of April , 2014, mailed or caused to be electronically transmitted a true copy of the foregoing Notice of Motion to the parties listed on the attached service list.

/s/ Wm. C. Parkinson, Jr.

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Office Of The U.S. Trustee  
701 E Broad Street, St 4304  
Richmond, VA 23219

Albion and Janice Whitmer  
P.O. Box 87  
Goochland, VA 23063

Amy W. Waldrop  
6347 Lakeway Drive  
Mechanicsville, VA 23111

Archie M. Gordon, Jr.  
6932 Parrish Road  
Louisa, VA 23093

Cach LLC/Square Two Financial  
Attention: Bankruptcy  
4340 South Monaco St. 2nd Floor  
Denver, CO 80237

Chase  
PO Box 24696  
Columbus, OH 43224

Chase  
P.O. Box 15298  
Wilmington, DE 19850

Chase  
c/o Nationwide Credit, Inc.  
1150 East University Dr. 1st Floor  
Tempe, AZ 85281

Chase Bank USA, NA  
Chase Card Svcs/Attn:Bankruptcy D  
PO Box 15298  
Wilmington, DE 19850

Chase Bank USA, NA  
c/o ARS National Services, Inc.  
P.O. Box 463023  
Escondido, CA 92046-3022

Citibank/AT&T Universal Card  
Attn.: Centralized Bankruptcy  
PO Box 20507  
Kansas City, MO 64195

Citibank/AT&T Universal Card  
c/o Capital Management Services, L.  
698 1/2 South Ogden Street  
Buffalo, NY 14206

Citimortgage Inc  
Po Box 9438  
Gaithersburg, MD 20898

Citimortgage, Inc  
PO Box 9438  
Gaithersburg, MD 20898

Citimortgage, Inc  
P.O. Box 688971  
Des Moines, IA 50368-8971

CitiMortgage, Inc.  
P.O. Box 2548  
Leesburg, VA 20177-7754

CitiMortgage, Inc.  
P.O. Box 6030  
Sioux Falls, SD 57117-6030

Commonwealth Of Virginia  
Dept. Of Taxation  
P.O. Box 1115  
Richmond, VA 23218-1115

Discover Bank  
DB Servicing Corporation  
PO Box 3025  
New Albany, OH 43054-3025

Discover Fin Svcs Llc  
PO Box15316  
Wilmington, DE 19850

Donna Felton  
1660 Rock Castle Road  
Goochland, VA 23063

Essex Bank  
c/o Timothy G. Moore, Esquire  
411 E. Franklin Street, Suite 600  
Richmond, VA 23219

Essex Bank, Successor by Merger  
c/o Spotts Fain PC  
411 E. Franklin St. Ste 600  
Richmond, VA 23219-2200

Franklin Federal Savings Bank  
P.O. Box 5310  
Glen Allen, VA 23058

Goochland County Office of the  
Treasurer  
P.O. Box 188  
Goochland, VA 23063

Gordon Construction Co., Inc.  
2945 River Road West  
Goochland, VA 23063-3230

GWG, LLC  
P.O. Box 1081  
Goochland, VA 23063

Harry Watkins  
1750 Haskins Road Apt. 2  
Goochland, VA 23063

IRS  
Centralized Insolvency Operations  
P.O. Box 7346  
Philadelphia, PA 19101-7346

Ishawntay Davis  
Amanda Mealy  
1750 Haskins Road Apt. 1  
Goochland, VA 23063

James R. LEWIS  
Issac Mayo  
3564 Athey Road  
Sandy Hook, VA 23153

John T. Hamner  
1420 Rock Castle Road  
Goochland, VA 23063

Johnie R Muncy, Esquire  
Samuel I. White, P.C.  
1804 Staples Mill Road, Suite 200  
Richmond, VA 23230

Keith Hamner Waldrop  
P.O. Box 268  
Goochland, VA 23063

Kristen Misleh, Esquire  
Devon Cipperly, Esquire  
P.O. Box 2548  
Leesburg, VA 20177

Kroger  
P.O. Box 30650  
Salt Lake City, UT 84130-0650

Leigh S. Gordon  
1820 Rock Castle Road  
Goochland, VA 23063

Louise Miles  
2416 Chapel Hill Road  
Goochland, VA 23063

Martine L. Gordon  
6932 Parrish Road  
Louisa, VA 23093-2568

Mercedes Benz Financial Services  
13650 Heritage Parkway  
Fort Worth, TX 76177-5323

Mercedes-Benz Financial Services USA  
c/o BK Servicing, LLC  
P.O. Box 131265  
Saint Paul, MN 55113-0011

Michael Craig-Gordon  
1820 Rock Castle Road  
Goochland, VA 23063-3610

Pamela B. Jones  
4004 Shannon Hill Road  
Columbia, VA 23038

Robert A. Canfield, Esquire  
Canfield, Baer & Heller LLP  
P.O. Box 1324  
Hopewell, VA 23860

Robert H. Chappell, III, Esquire  
Timothy G. Moore, Esquire  
411 East Franklin Street, Suite 600  
Richmond, VA 23219

Robert Van Arsdale, Asst US Trustee  
Office Of The U.S. Trustee  
701 E Broad Street, St 4304  
Richmond, VA 23219

Rock Castle Partners  
P.O. Box 268  
Goochland, VA 23063-0268

Samuel I. White, P.C.  
1804 Staples Mill Road, Suite 200  
Richmond, VA 23230

Sandra W. Williams  
214 Forest Drive  
Falls Church, VA 22046

Sara A. John, Esquire  
M. Richard Epps, P.C.  
605 Lynnhaven Parkway  
Virginia Beach, VA 23452

Three Square, LLC  
3600 River Road West  
Goochland, VA 23063

Timothy B. Heavner, Esquire  
Special Assistant United States Attorney  
400 N 8th St, Suite 636, Mail Box 77  
Richmond, VA 23219